

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 21-173 (PJS/DTS)

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
ANTON JOSEPH LAZZARO,)
)
)
 Defendant.)

**DEFENDANT'S MOTION
FOR LEAVE TO FILE
ADDITIONAL PRETRIAL
MOTIONS**

The Defendant, Anton Lazzaro, by and through his undersigned attorneys, respectfully moves this Court for leave to submit additional pretrial motions beyond the previously ordered submission date of January 10, 2022. While Mr. Lazzaro has received extensive disclosures from the Government, he is still waiting for certain electronic data, including the results of searches executed on his own devices. Without access to this information, Mr. Lazzaro cannot adequately review the Government's discovery for the purposes of potential pre-trial challenges.

Upon the arrest of Mr. Lazzaro and the search of his residence, law enforcement seized twenty-one devices, including several cell phones, laptops, and thumb drives. The Government has exclusive possession and control over these items, and while access to inspect has finally been offered, the process required to image the devices and analyze the contents has not been completed and will not allow for timely submissions of any relevant motions. The Government has disclosed some results from search warrant productions from SnapChat, but Mr. Lazzaro requires and seeks access to view the devices themselves for potential exculpatory information and/or legal challenges.

Mr. Lazzaro has retained an expert in this field who will be assisting counsel with the digestion of all this data. He now respectfully requests the Court allow the filing of additional motions related to digital discovery. This motion is based on the indictment, records and files in the above-entitled action, and the possibility that the inspection of this digital discovery may lead to information which would provide the basis for action by the Court prior to trial.

Respectfully submitted,

Dated: January 14, 2022

/s/Catherine Turner
Catherine L. Turner
MN Attorney ID #0349057
331 Second Avenue South
Suite 705
Minneapolis, MN 55419
Tel: (612) 361-4895
Fax: (866) 663-4338
E-mail: catherine@catherineturnerlaw.com

Dated: January 14, 2022

/s/Zachary Newland
Zachary Lee Newland
Senior Litigation Counsel
Jeremy Gordon P.L.L.C.
P.O. Box 2275
Mansfield, Texas 76063
Tel: (972) 483-4865
Fax: (972) 584-9230
E-mail: zach@gordonddefense.com
Texas Bar: 24088967
<https://gordonddefense.com>

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was duly filed and served upon counsel of record, via the Court's CM/ECF system, this 14th day of January 2022.

/s/Catherine Turner
Catherine Turner